

## REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed February 7, 2008. Reconsideration and allowance of the application and pending claims are respectfully requested.

### **Claim Rejections - 35 U.S.C. § 103(a)**

Claims 1, 2, 3, 4, and 10-20 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Roztocil, et al.* ("Roztocil," U.S. Pub. No. 2001/0044868) in view of *Kemp* (U.S. Pub. No. 2001/0078160). Applicant respectfully traverses.

As has been acknowledged by the Court of Appeals for the Federal Circuit, the U.S. Patent and Trademark Office ("USPTO") has the burden 35 U.S.C. § 103 to establish obviousness by showing objective teachings in the prior art or generally available knowledge of one of ordinary skill in the art that would lead that individual to the claimed invention. *In re Fine*, 837 F.2d 1071, 1074, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). The key to supporting an allegation of obviousness under 35 U.S.C. § 103 is the clear articulation of the reasons why the Examiner believes that claimed invention would have been obvious. See MPEP § 2141. As stated by the Supreme Court, "[r]ejections on obviousness cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." *KSR v. Teleflex*, 550 U.S. at \_\_\_, 82 USPQ2d at 1396 (quoting *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006)).

Applicant respectfully submits that the Examiner has not established that Applicant's claims are obvious in view of the prior art. Applicant discusses those claims in the following.

#### A. The Roztocil Disclosure

Roztocil discloses a production work flow 100 of a "typically production print shop." *Roztocil*, paragraph 0020. The work flow 100 comprises various stages, including job origination 102, job submission 104, job preparation 106, print production 108, and final fulfillment 110. *Roztocil*, Figure 1.

As shown in Figure 1, the print shop includes a computer network 112 that includes computer work stations 114, 116, servers 118, 120, and output devices 122. *Roztocil*, paragraph 0021. A customer can submit a job during job origination 102 by either physically delivering to the print shop one or more documents in hard copy or electronic form or by transmitting the one or more documents to the print shop via the Internet. *Roztocil*, paragraph 0022. After that point, all aspects of the production work flow 100 are performed at the print shop using its network 112. See *Roztocil*, paragraphs 0023-0033.

Included in the production work flow 100 performed at the print shop is what Roztocil calls "user functionality workflow 200." *Roztocil*, paragraph 0034. That workflow 200 includes a preflight stage 204 that is performed using a workflow management software program that executes on a job preparation workstation 116 at the print shop. *Roztocil*, paragraph 0036. Using that program, operators at the print shop can obtain

data about the various output devices 122 of the print shop, including their availability and capabilities. *Roztocil*, paragraph 0045.

As can be appreciated from the above, with the exception of transmitting documents over the Internet to Roztocil's print shop, no actions of Roztocil's disclosed production work flow are performed at a customer's (e.g., designer's) location.

## B. The Kemp Disclosure

Kemp discloses a system and method for printing over the Internet. As described by Kemp, the system includes a client 1, a service provider 2, and a portal 3. *Kemp*, paragraph 0035. The client 1 includes a computer workstation 10 that uses various application programs that can generate data to be printed. *Kemp*, paragraph 0036. The service provider 2 includes a server 20 that can receive print requests and processes print jobs. *Kemp*, paragraph 0039. The portal 3 comprises a source (e.g., the sole source) of information about a plurality of service providers, including service provider 2. *Kemp*, paragraph 0042. More specifically, the portal 3 includes a database of service provider "information" that the client 1 may access. *Kemp*, paragraph 0042.

The client 1 may submit queries to the portal 3 to locate a suitable service provider. *Kemp*, paragraph 0043. Once such a service provider is located (e.g., service provider 2), the client submits a job ticket to the service provider server 20. *Kemp*, paragraph 0053. If, after reviewing the job ticket, the service provider 2 determines that it can perform the print job described in the job ticket, the service provider replies to that effect to the client 1, at which time the client may then transmit the print job to the service provider for processing. *Kemp*, paragraph 0056.

### C. Applicant's Claims

Applicant's independent claim 1 provides as follows:

1. A method of managing workflow in a commercial printing environment including a designer location and a print service provider location, said method comprising:
  - a digital printer establishing a closed-loop communication link between the designer location and the print service provider location;
  - the digital printer sending current configuration information stored within memory of the digital printer to the designer location via the closed-loop communication link;
  - creating a press ready file at the designer location using the current configuration information received from the digital printer via the closed-loop communication link;
  - submitting the press ready file from the designer location to the print service provider location via the closed-loop communication link;
  - receiving at the print service provider location a printed output of the press ready file from the digital printer; and
  - packaging the printed output at the print service provider location using an automated packaging device.

In the Office Action, it is argued that Roztocil discloses each limitation of claim 1, except for the "packaging" limitation. Applicant respectfully disagrees that Roztocil discloses the other limitations.

As a first matter regarding the Roztocil reference, Roztocil does not disclose or suggest "a digital printer establishing a closed-loop communication link between the designer location and the print service provider location". Although, Roztocil describes

a customer transmitting a print job over the Internet to Roztocil's print shop (*Roztocil*, paragraph 0022), thereby establishing what may be referred to as a communication link, Roztocil does not identify a communication link between "a digital printer" and a designer location. Regarding the Examiner's identification of paragraph 0022 of the Roztocil disclosure, that paragraph says nothing of a designer (customer) location being linked with a "digital printer" of a print service provider location (i.e., Roztocil's print shop).

As a second matter regarding the Roztocil reference, Roztocil does not disclose or suggest "the digital printer sending current configuration information stored within memory of the digital printer to the designer location via the closed-loop communication link". Because no "link" is formed between a digital printer and the designer location in Roztocil, it follows that no digital printer sends "current configuration information" to the designer location via the link.

As a third matter regarding the Roztocil reference, Roztocil does not disclose or suggest "creating a press ready file at the designer location using the current configuration information received from the digital printer via the closed-loop communication link". Although Roztocil describes the creation of a "ready for printer file" that includes a print job and a job ticket, Roztocil explicitly states that the file is created during "job preparation 106," which is performed at Roztocil's print shop by one of the print shop operators. See *Roztocil*, paragraphs 0027 and 0028. In addition, because no designer location receives current configuration information from a digital printer, it logically follows that such a designer location cannot create any file "using the current configuration information" as required by claim 1.

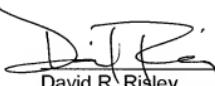
Turning to the Kemp reference, which is alleged to disclose "packaging the printed output at the print service provider location using an automated packaging device", Applicant notes that although Kemp discusses identification of customer shipping preferences, Kemp does not disclose or suggest packaging a printed output using an "automated packaging device" in either paragraph 0041 or paragraph 0064. Indeed, Kemp says nothing about packaging devices at all.

In view of the foregoing, it is clear that the applied references do not render independent claim 1 obvious. Applicant therefore respectfully submits that claim 1 and its dependents are allowable. Applicant further submits that independent claims 10 and 11 are allowable for similar reasons. In particular, neither applied reference discloses or suggests an "automated packaging device" as recited in claim 10, and neither applied reference discloses or suggests a digital printer configured to "establish a closed-loop communication link with a designer location" or "send the current configuration information stored within digital printer memory to the designer location via the closed-loop communication link", and an automated packaging device configured to "communicate over the closed-loop communication link with the designer location and with the print service provider location", "send the current configuration information stored within the packaging device memory to the designer location via the closed-loop communication link", or "package the printed outputs generated by the digital printer according to the instructions associated with the print job".

**CONCLUSION**

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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